

South Dakota Public Utilities Commission

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April 20, 1998

FOUO

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Re: CC Docket No. 96-45 (Report to Congress)

Dear Ms. Salas:

Enclosed are an original plus five copies of the South Dakota Public Utilities Commission's Comments to be filed in the above docket. Please date-stamp one copy and return it in the enclosed, self-addressed stamped envelope.

Sincerely,

William Bullard, Jr.
Executive Director

CGB:cgb
Enclosure
cc: Parties of Record
Congress

Enclosures rec'd

0+4

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	CC Docket No. 96-45
)	(Report to Congress)
Federal-State Joint Board on)	
Universal Service)	

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**COMMENTS OF THE
SOUTH DAKOTA PUBLIC UTILITIES COMMISSION**

Pursuant to Sections 1.49, 1.415, and 1.419 of the Federal Communications Commission's ("FCC" or "Commission") Rules of Practice and Procedure, 47 C.F.R. §§ 1.49, 1.415, and 1.419 (1997), the South Dakota Public Utilities Commission ("SDPUC") respectfully submit the following comments addressing the FCC's April 10, 1998 Report to Congress on Universal Service under the Telecommunications Act of 1996 ("Act") released in the above captioned proceeding.

The SDPUC generally believes the Commission should be commended for its efforts to implement the universal service provisions of the Act. Facing a host of

complicated and controversial issues and operating under very tight time constraints, the FCC has already implemented extensive changes to traditional policy. As Congress anticipated, these changes were necessary to adjust the regulatory paradigm to the introduction of competition into the local telephone service market facilitated by other parts of the Act.

The FCC's Report to Congress addresses many issues that are very important to the SDPUC. However, the positions taken by the FCC on a number of these issues give us great concern. Although the SDPUC and other parties have filed comments with the FCC that have expressed our concerns, the positions taken by the FCC in its Report to Congress on these issues remain unchanged. All issues focus on the FCC's interpretations of the universal service provisions found in § 254 of the new legislation. We note that these issues are the result of the FCC taking a position without the input of a Federal State Joint Board. We also believe that by requiring a Federal State Joint Board, Congress recognized that every issue raised under this docket will have a significant impact on intrastate operations and local rates. Significantly, none of the issues raised by the SDPUC were presented to or considered by the Joint Board. We will comment on the issues that are of most concern to us.

A. The FCC's decisions regarding the percentage of universal service support provided by the federal mechanisms.

Although the FCC states in its Report that it will reconsider the 75-25% State-Federal High Cost Funding split, this issue has not been considered or recommended by the Joint Board and is an issue of intense interest to the SDPUC. The Act states that the services defined by the Commission are supported by the Federal universal support mechanisms. The definition of universal service as stated in the Federal State Joint Board's Recommended Decision is a Federal universal service definition. The universal service fund will be based on providing this level of service. Therefore, this level of universal service should be supported by the Federal support mechanisms as stated in the Act. The Act does not allow States to utilize the Federal universal service fund to support a State's definition and standard for universal service. The Act also states that there should be specific, predictable and sufficient Federal and State mechanisms to preserve and advance universal service. This means that the Federal support fund must be sufficient to fund the federal definition of universal service at the 100% level not 25%. Any support less than 100% does not appear to be sufficient as required by the Act.

B. The Commission has not moved from its position taken under its Access

Charge Reform Order (CC Docket No.96-262 adopted May 7, 1997 and released May 16, 1997) which directs incumbent local exchange companies to use any universal service support received from the new universal service support mechanisms to reduce or satisfy the interstate access charge revenue requirement.

The SDPUC is very concerned with the impact this position will have on Universal Service which it believes is the most serious problem with universal service support. Paragraph 381 of the Order directs incumbent local exchange companies to use any universal service support received from the new universal service support mechanisms to reduce or satisfy the interstate access charge revenue requirement. This means that universal service support, no matter what the size of the fund or who contributes to the fund, will no longer be used to maintain affordable local rates and support local exchange companies networks. The fund will be used to reduce interstate access charges that may or may not be passed on to the end-user through lower toll rates. Universal support as we know it today will now become the responsibility of the states to support 100%. Why should or why would any state want to contribute to a fund that is going to be used to reduce interstate access charges and not support universal service? This approach taken by the FCC changes the complete concept of Universal Service Support.

C. The Current Triparte Structure for Administering the Various Federal Universal Service Programs is Administratively Cumbersome and Should Be Revised.

The SDPUC is concerned with the adoption of the three part structure for administering the Federal universal service programs. The overhead and associated administrative expenses for operating three separate entities [NECA, SLC subsidiary, and HCC subsidiary] are substantially higher when compared to the contemplated expenses of operating one single entity. The SDPUC believes that the triparte structure will result in a duplication of effort that will compromise efficiency. It also appears that both USAC and the Corporations have been assigned the responsibility to perform other unenumerated tasks that inevitably will arise.

Unfortunately, none of the above issues were considered by the Federal State Joint Board. The language of the Act, in several places, demonstrates that Congress intended the major policy initiatives coming out of this proceeding to be based upon the recommendation of the Joint Board.

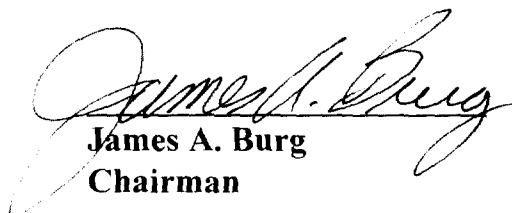
We believe that the Congressional intent is obvious. While the Commission is not bound by the Joint Board recommendations, Congress obviously wanted the

FCC's major policy determinations in this docket to be reviewed by the Joint Board a composite fact-finding and decisional body that derives its record-based recommendations from a unique balance of Federal and State regulatory and State Consumer Advocate expertise. These issues will have a significant and direct impact on State policy. Nothing is more central to the universal service plan than the rulings raised after the Joint Board took action such as the amount of funding, placing new funding requirements on the intrastate jurisdiction, changing the historical focus of the fund from reducing the costs of local service in high cost areas to reducing interstate access charges. All these issues go to the very heart of the universal service program.

Given that the Act contemplates Joint Board recommendations on all major universal service policy issues in advance of any final Commission action, if some interested party is unhappy with the FCC's final determinations, they may well argue, successfully, to the Courts of Appeal that the FCC, in not getting a Joint Board recommendation, failed to comply with the Act. This would further disrupt Federal and State efforts to implement the Act.

The SDPUC respectfully submits these comments to the FCC to consider.

Respectfully submitted by the South Dakota Public Utilities Commission this
20th day of April 1998.



James A. Burg
Chairman



Pam Nelson
Commissioner

CERTIFICATE OF SERVICE

I hereby certify that copies of the Comments of the South Dakota Public Utilities Commission were served on the following by mailing the same to them by United States Post Office First Class Mail, postage thereon prepaid, at the address shown below on the 20th day of April, 1998.

See attached Exhibit A.

A handwritten signature in cursive script, reading "Delaine Kolbo", written over a horizontal line.

Delaine Kolbo
Legal Secretary
South Dakota Public Utilities Commission
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EXHIBIT A

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